

FREIGHT FORWARDERS SETTLEMENT
C/O FREIGHT FORWARDERS CLAIMS ADMINISTRATOR
PO BOX 3747
PORTLAND, OREGON 97208-3747
U.S.A

CLAIMANT NAME
ADDRESS
CITY STATE ZIP
COUNTRY

CLAIM FORM

GENERAL INSTRUCTIONS

This Claim Form relates to *Precision Associates, Inc., et al. v. Panalpina World Transport (Holding) LTD, et al.*, 08 Civ. 0042 (JG) (VVP) in the United States District Court for the Eastern District of New York.

To be eligible to share in the Settlement Fund for the Settlement Class in the above-named class action, you must have (1) directly purchased Freight Forwarding Services; (2) from any of the Settling or Non-Settling Defendants, their subsidiaries, or affiliates; (3) from January 1, 2001 through September 14, 2012; (4) in the U.S., **or** outside the U.S. for shipments within, to, or from the U.S.

“Freight Forwarding Services” means freight forwarding, transportation, or logistics services for shipments, including services relating to the organization or transportation of items via air, ocean, rail, and road, both nationally and internationally, and related activities such as customs clearance, warehousing, and ground services.

If you fit this description you are a member of the Settlement Class and are entitled to submit a claim to share in the Settlement Fund. Excluded from the Settlement Class are all Defendants, their subsidiaries and affiliates, and their co-conspirators. Also excluded from the Settlement Class are all governmental entities.

Settlement Class Members who seek payment from the Settlement Fund must complete and return this Claim Form. Completed Claim Forms must be mailed to the Freight Forwarders Claims Administrator (“Claims Administrator”) at the above address or can be submitted via the Settlement website, www.FreightForwardCase.com. **Claim Forms must be POSTMARKED OR SUBMITTED ONLINE NO LATER THAN NOVEMBER 22, 2013.** You should save all relevant documents supporting your claim as you may be required to provide them later.

All inquiries regarding your claim should be made (1) in writing to the Claims Administrator at the address above, (2) by visiting the settlement website, www.FreightForwardCase.com, (3) via e-mail at questions@FreightForwardCase.com, or (4) by calling the information helpline: U.S. & Canada (Toll-Free) 1-877-276-7340; International (Toll) (503) 520-4400.

Before you complete and submit this Claim Form by mail or online, you should read and be familiar with the Notice of Proposed Class Action Settlement ("the Notice") available at www.FreightForwardCase.com. Defined terms (with initial capitals) used in these General Instructions have the same meaning as set forth in the Notice. By submitting this Claim Form, you acknowledge that you have read and understand the Notice, and you agree to the Releases included as a material term of each settlement agreement.

If you fail to submit a timely Claim Form, your claim may be rejected and you may be precluded from any recovery from the Settlement Fund. If you are a member of the Settlement Classes and you do not timely and validly seek exclusion from the Settlement Classes, you will be bound by any judgment entered by the Court approving the Settlements regardless of whether you submit a Claim Form.

To receive the most current information and regular updates, please submit your Claim Form on the settlement website at www.FreightForwardCase.com. On the settlement website, you will be able to submit web claims and receive future notices via email. Accordingly, if you prefer to receive all future notices by *mail only*, please check here.

SECTION A – CLAIMANT INFORMATION

Claimant Name(s) (As you would like the name(s) to appear on the check, if eligible for payment):

Name Of The Person You Would Like The Claims Administrator To Contact Regarding This Claim (if different from the Claimant Name(s) listed above):

Claimant or representative contact information: The Claims Administrator will use this information for all communications relevant to this Claim (including the check, if eligible for payment). If this information changes, you **MUST** notify the Claims Administrator in writing at the address above or online at www.FreightForwardCase.com.

Street Address:

City:

State/Province:

Zip Code:

**Country
(Other than U.S.):**

Daytime

Telephone Number:

Evening

Telephone Number:

2

QUESTIONS? CALL U.S. & CANADA (TOLL –FREE): 1-877-276-7340; INTERNATIONAL (TOLL): 1-(503) 520-4400; OR VISIT www.FreightForwardCase.com

Email Address:

IF YOU FAIL TO SUBMIT A COMPLETE CLAIM BY **NOVEMBER 22, 2013**, YOUR CLAIM IS SUBJECT TO REJECTION
OR YOUR PAYMENT MAY BE DELAYED.

SECTION B – SCHEDULE OF QUALIFYING PURCHASES OR SHIPMENTS

Please provide a summary of all Freight Forwarding Shipping Services that you have purchased from any of the below listed defendants or their subsidiaries or affiliates: (1) for shipments within, to, or from the United States or (2) in the United States for shipments anywhere in the world, during the period from January 1, 2001 to September 14, 2012. Please type or print neatly all information and check all that apply. If you need additional space, please continue on additional pages, make a note of the same on this Claim Form, and submit your additional pages with this Claim Form. Round the total purchase amount to the nearest dollar or whole unit of the currency for which you are claiming. Please indicate the currency you are using (Example: USD, EUR, CAD, JPY, CNY). Please also specify the date(s) of your purchase(s) and the origin(s) and destination(s) of your shipment(s).

Freight Forwarder (Indicate all that apply)	Total Purchase Amount January 1, 2001 through September 14, 2012 (All Freight Charges And Surcharges, Excluding Taxes On Those Charges)			Shipping Routes	
	CURRENCY	AMOUNT	DATE(S)	ORIGIN(S)	DESTINATION(S)
ABX or SAIMA					
BAX Global					
Dachser					
DFDS or DSV					
DHL, Danzas, (dba, DHL Global Forwarding), or Deutsche Post					
DHL Japan , DHL Global Forwarding Japan K.K., Danzas Maruzen, Airborne Express, or Air Express International					
EGL or Eagle					
Exel					
Expeditors					
Geodis or Geodis Wilson					
Geo-Logistics or Agility					
Hankyu Hanshin Express, Hankyu Travel International or Hanshin Air Cargo					
Hellman					
Jet Speed					
Kuehne + Nagel or Kühne + Nagel					

Kintetsu World Express				
"K" Line Logistics				
MOL Logistics				
Morrison Express				
Nippon Express				
Nishi-Nippon				
Nissin				
Panalpina				
Schenker or Deutsche Bahn				
SDV				
Toll or Baltrans				
UPS Supply Chain Solutions Inc., United Parcel Service (UPS), Menlo Worldwide, or Emery				
United Aircargo Consolidators				
UTi Worldwide				
Vantec				
Yamato				
Yusen Air & Sea				

1. Please state the sum total of freight forwarding shipments that you made with all Defendants or affiliates of the Defendants for each of the following:

a. For air shipments from Japan into the United States

Total number of Shipments between September 1, 2002 and November 30, 2007	
Total number of Shipments between December 1, 2007 and September 14, 2012	

b. For air shipments from anywhere in the world (except Japan) to the United States.

Total number of Shipments from January 1, 2003 to November 30, 2007	
Total number of Shipments from December 1, 2007 to September 14, 2012	

c. For ocean shipments from anywhere in the world to the United States.

Total number of Shipments between September 1, 2002 and November 30, 2007	
Total number of Shipments between December 1, 2007 and September 14, 2012	

2. Please state the sum total poundage of freight forwarding shipments that you made with all Defendants or affiliates of the Defendants for each of the following:

- a. For air shipments from anywhere in the world to or from the United States

Total Pounds of shipments between October 1, 2001 and November 30, 2007	
Total Pounds of shipments between December 1, 2007 and September 14, 2012	

- b. For air shipments from Japan to the United States; or for air shipments purchased in the United States for shipment from Japan to anywhere in the world:

Total pounds of Shipments between September 1, 2002 and November 30, 2007	
Total pounds of Shipments from December 1, 2007 to September 14, 2012	

3. Please state the sum total dollar Purchase Amount that you paid for freight forwarding shipments to all Defendants or affiliates of the Defendants during the following time periods on the following routes:

- a. From July 5, 2005 to December 31, 2006 from China to the United States

Total Purchase Amount		Shipping Route	
Currency	Amount	Origin(s)	Destination(s)

- b. From Hong Kong to the United States during (i) August 2005 to January 1, 2006; (ii) August 2006 to January 1, 2007; (iii) August 2007 to January 1, 2008 time period; or for shipments from Hong Kong to anywhere in the world that were purchased in the United States for the same periods of time:

Total Purchase Amount		Shipping Route	
Currency	Amount	Origin(s)	Destination(s)

If you know that you have made shipments with Defendants within the timeframes above, but cannot state your purchases with specificity, please state the reasons why you cannot provide the information requested.

SECTION C – SUBMISSION TO JURISDICTION OF THE COURT

By signing below, you are submitting to the jurisdiction of the United States District Court for the Eastern District of New York.

SECTION D – CERTIFICATION UNDER PENALTY OF PERJURY

I hereby certify under penalty of perjury that:

1. The information provided in this Claim Form is accurate and complete to the best of my knowledge, information and belief;
2. I agree to provide additional information to Settlement Class Counsel or the Claims Administrator to support my claim, if necessary;
3. I am either (a) a member of the Settlement Class and did not request to be excluded from the Settlement Class or (b) the assignee or transferee of, or the successor to, the claim of a member of the Settlement Class and did not request to be excluded from the Settlement Class;
4. I have not entered into a settlement for any of the claims set forth in this Claim Form;
5. I am neither a Defendant, nor a parent, employee, subsidiary or affiliate of a Defendant;
6. I am not a government entity; and
7. I have not submitted any other claim for the same purchases of Freight Forwarding Shipping Services and have not authorized any other person or entity to do so, and know of no other person or entity having done so on my behalf.

Signature

M M D D Y Y

QUESTIONS? CALL U.S. & CANADA (TOLL –FREE): 1-877-276-7340; INTERNATIONAL (TOLL): 1-(503) 520-4400; OR VISIT www.FreightForwardCase.com

Class Member (Print your name)

Claimant Name (if different from above)

Title (e.g., President, CFO)

Taxpayer ID/SSN No.

Phone Number

If You Purchased Freight Forwarding Services

You Could Get Benefits from a Class Action Settlement

A class action lawsuit claims that freight forwarders throughout the world ("Defendants") conspired to fix prices for their services, including on routes between the U.S. and China, Hong Kong, Japan, Taiwan, and the U.K. Some of the companies who were sued have agreed to Settlements. These "Settling Defendants" are ABX Logistics Worldwide NV/SA; EGL, Inc. and EGL Eagle Global Logistics; Expeditors International of Washington, Inc.; Kuehne + Nagel International AG and Kuehne + Nagel, Inc.; Morrison Express Logistics Pte. (Singapore) and Morrison Express Corporation (U.S.A.); Nishi-Nippon Railroad Co., Ltd.; Schenker, Inc. and its parents, subsidiaries, and affiliates, including Deutsche Bahn AG, Schenker AG, and Bax Global, Inc.; United Aircargo Consolidators, Inc.; UTi Worldwide, Inc.; and Vantec Corporation and Vantec World Transport (USA), Inc. The lawsuit continues against the Non-Settling Defendants (see the website below for a list). The Settling Defendants vigorously deny they did anything wrong. They have asserted a number of defenses but have agreed to settle to avoid the cost and risk of trial. The case is continuing against non-settling defendants.

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Am I Included?

You may be included in one or more of the Settlements (as a Class Member) if you: 1) Directly purchased Freight Forwarding Services; 2) from any of the Settling or Non-Settling Defendants, their subsidiaries, or affiliates; 3) from January 1, 2001 through September 14, 2012; 4) in the U.S., or outside the U.S. for shipments within, to, or from the U.S. "Freight Forwarding Services" means freight forwarding, transportation, or logistics services for shipments, including services relating to the organization or transportation of items via air, ocean, rail, and road, both nationally and internationally, and related activities such as customs clearance, warehousing, and ground services. All you need to know is in the full Notice, including information on who is or is not a Class Member.

What Do the Settlements Provide?

The Settling Defendants will establish a Settlement Fund with a minimum of ~~\$102,111,864.54~~ \$105,611,864.54.

How to Get Benefits?

If you are a Class Member and do not opt out of these Settlements, you are eligible to submit a claim and receive benefits. The amount of your benefits will be determined by the Plan of Allocation, which will be posted on the site www.FreightForwardCase.com on or before ~~January 25~~ March 4, 2013. A claim form has been provided with this notice. You can obtain an additional Claim Form by calling 1-877-276-7340 or visiting www.FreightForwardCase.com. The claims deadline is November 22, 2013.

Your Other Rights

If you do not want to be legally bound by one or more of the Settlements, or you want to sue a Settling Defendant separately about the claims in this lawsuit, you must exclude yourself in writing by identifying each Settlement for which you seek exclusion. The exclusion deadline is ~~March 29~~ June 28, 2013. If you stay in a Settlement, you may object to it by ~~March 29~~ June 28, 2013. The Detailed Notice, available at the website below, explains how to exclude yourself and object. The Court has appointed lawyers to represent you at no charge to you. You may hire your own lawyer at your own cost. The Court will hold a hearing on ~~May 13~~ August 12, 2013, at 10:00 a.m. to consider 1) whether to approve the Settlements and plan of distribution, and 2) Class Counsel's request for fees of up to 33% of the Settlement Fund, plus interest, and reimbursement for their expenses. You or your own lawyer may ask to appear and speak at the hearing.

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This notice is only a summary. For detailed information:

**Call U.S. & CANADA: 1-877-276-7340 (Toll-Free), INTERNATIONAL: 1-503-520-4400 (Toll)
or Visit www.FreightForwardCase.com**

If You Purchased Freight Forwarding Services

You Could Get Benefits from a Class Action Settlement

A class action lawsuit claims that freight forwarders throughout the world ("Defendants") conspired to fix prices for their services, including on routes between the U.S. and China, Hong Kong, Japan, Taiwan, and the U.K. Some of the companies who were sued have agreed to Settlements. These "Settling Defendants" are ABX Logistics Worldwide NV/SA; EGL, Inc. and EGL Eagle Global Logistics; Expeditors International of Washington, Inc.; Kuehne + Nagel International AG and Kuehne + Nagel, Inc.; Morrison Express Logistics Pte. (Singapore) and Morrison Express Corporation (U.S.A.); Nishi-Nippon Railroad Co., Ltd.; Schenker, Inc. and its parents, subsidiaries, and affiliates, including Deutsche Bahn AG, Schenker AG, and Bax Global, Inc.; United Aircargo Consolidators, Inc.; UTi Worldwide, Inc.; and Vantec Corporation and Vantec World Transport (USA), Inc. The lawsuit continues against the Non-Settling Defendants (see the website below for a list). The Settling Defendants vigorously deny they did anything wrong. They have asserted a number of defenses but have agreed to settle to avoid the cost and risk of trial. The case is continuing against non-settling defendants.

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What Do the Settlements Provide?

The Settling Defendants will establish a Settlement Fund with a minimum of ~~\$102,111,864.54~~ \$105,611,864.54.

How to Get Benefits?

If you are a Class Member and do not opt out of these Settlements, you are eligible to submit a claim and receive benefits. The amount of your benefits will be determined by the Plan of Allocation, which will be posted on the site www.FreightForwardCase.com on or before ~~January 25~~ March 4, 2013. You can obtain a Claim Form by calling 1-877-276-7340 or visiting www.FreightForwardCase.com. The claims deadline is November 22, 2013.

Your Other Rights

If you do not want to be legally bound by one or more of the Settlements, or you want to sue a Settling Defendant separately about the claims in this lawsuit, you must exclude yourself in writing by identifying each Settlement for which you seek exclusion. The exclusion deadline is ~~March 29~~ June 28, 2013. If you stay in a Settlement, you may object to it by ~~March 29~~ June 28, 2013. The Detailed Notice, available at the website below, explains how to exclude yourself and object. The Court has appointed lawyers to represent you at no charge to you. You may hire your own lawyer at your own cost. The Court will hold a hearing on ~~May 13~~ August 12, 2013, at 10:00 a.m. to consider 1) whether to approve the Settlements and plan of distribution, and 2) Class Counsel's request for fees of up to 33% of the Settlement Fund, plus interest, and reimbursement for their expenses. You or your own lawyer may ask to appear and speak at the hearing.

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This notice is only a summary. For detailed information:

**Call U.S. & CANADA: 1-877-276-7340 (Toll-Free), INTERNATIONAL: 1-503-520-4400 (Toll)
or Visit www.FreightForwardCase.com**

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

If You Purchased Freight Forwarding Services You Could Get Benefits from a Class Action Settlement

A Federal Court authorized this notice. This is not a solicitation from a lawyer.

- Settlements have been reached in a class action lawsuit involving freight forwarding services.
- The lawsuit claims that the companies included in these Settlements, called Settling Defendants (*see* Question 1 for a list of Settling Defendants), conspired with other freight forwarding companies to fix prices for freight forwarding services worldwide. The routes affected, among others, include those between the U.S. and China, Hong Kong, Japan, Taiwan, and the UK. Plaintiffs claim that Defendants agreed to fix various charges and surcharges associated with providing freight forwarding services.
- The Settling Defendants vigorously deny they did anything wrong. They have asserted a number of defenses but have agreed to settle to avoid the cost and risk of trial.
- If you bought freight forwarding services in the U.S. or outside the U.S. but for shipments within, to, or from the U.S., you could be a Settlement Class Member.
- Your legal rights are affected whether you act or don't act. Read this notice carefully.

YOUR LEGAL RIGHTS AND OPTIONS IN THESE SETTLEMENTS	
Exclude Yourself	Exclude yourself from one or more of the Settlements. Get no benefit from the Settlements. Preserve your right to sue the Settling Defendants separately about the claims in this case (<i>see</i> Question 10).
Object	Write to the Court if you do not like the Settlement(s) (<i>see</i> Question 16).
Go to a Hearing	You may speak at the hearing about any objection you have to the Settlements (<i>see</i> Question 20).
File a Claim	File a claim for payment (<i>see</i> Question 8).

- These rights and options – **and the deadlines to exercise them** – are explained in this notice.
- The Court in charge of this case has preliminarily approved the Settlements but still has to decide whether to finally approve the Settlements.

Questions? Call U.S. & CANADA (TOLL-FREE): 1-877-276-7340 INTERNATIONAL (TOLL) 1-503-520-4400
or Visit www.FreightForwardCase.com

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2. Why is this a class action?
3. Why are there Settlements?

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5. What are Freight Forwarding Services?
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Questions? Call U.S. & CANADA (TOLL-FREE): 1-877-276-7340 INTERNATIONAL (TOLL) 1-503-520-4400
or Visit www.FreightForwardCase.com

BASIC INFORMATION

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1. What is this lawsuit about?

Freight forwarding companies (“Defendants”) around the world were sued by a group of businesses (“Plaintiffs”) who claim that the companies conspired, in violation of antitrust laws, to fix the prices for freight forwarding services during certain time periods. The Plaintiffs claim that the Defendants’ conspiracies were worldwide, including on shipping routes between the United States and China, Hong Kong, Japan, Taiwan, and the United Kingdom. Plaintiffs claim that Defendants agreed to fix various charges and surcharges associated with providing freight forwarding services.

Some of the Defendants the Plaintiffs sued have agreed to Settlements in the lawsuit. They are called Settling Defendants and are the following companies:

- ABX Logistics Worldwide NV/SA:

- EGL, Inc. and EGL Eagle Global Logistics, LP (“EGL”);
- Expeditors International of Washington, Inc. (“Expeditors”);
- Kuehne + Nagel International AG and Kuehne + Nagel, Inc.;
- Nishi-Nippon Railroad Co., Ltd. (“Nishi-Nippon”);
- Schenker, Inc. and its parents, subsidiaries, and affiliates, including Deutsche Bahn AG, Schenker AG, and Bax Global, Inc. (“Schenker”);
- Morrison Express Logistics Pte. (Singapore) and Morrison Express Corporation (U.S.A.);
- United Aircargo Consolidators, Inc.;
- UTi Worldwide, Inc.; and
- Vantec Corporation and Vantec World Transport (USA), Inc. (“Vantec”)

The lawsuit is continuing against the rest of the Defendants, who are called Non-Settling Defendants.

The Settling Defendants vigorously deny they have done anything wrong. They have asserted a number of defenses but have agreed to settle to avoid the cost and risk of trial.

For a full list of all Defendants in this lawsuit, please see Attachment 1 to this Notice. This list is also available on the Settlement Website, www.FreightForwardCase.com.

The case was filed in the United States District Court for the Eastern District of New York. It is called *Precision Associates, Inc. v. Panalpina World Transport*, No. 08-cv-00042 (JG).

2. Why is this a class action?

In a class action, one or more people or businesses, called class representatives, (in this case, Precision Associates, Inc., Anything Goes LLC, JCK Industries, Inc., RBX Industries, Inc., Mary

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Elle Fashions, Inc. d/b/a Meridian Electric, Printing Technology, Inc., Inter-Global, Inc., Zeta Pharmaceuticals LLC, Kraft Chemical Company, David Howell Product Design, Inc. d/b/a David Howell & Company, Innovation 714, Inc., Mika Overseas Corporation, and ~~Norma~~**NORMA** Pennsylvania, Inc.) sue on behalf of others who have similar claims. All of those who have claims similar to the class representatives are a Class or Class Members, except for those who exclude themselves (*see* Question 10).

3. Why are there Settlements?

The Court has not decided in favor of either side. The attorneys for the Class Representatives have investigated the facts and applicable law regarding the Class Representatives' claims and the Settling Defendants' defenses. The parties have engaged in lengthy negotiations in reaching these Settlements. The Class Representatives and their attorneys think the Settlements are best for everyone who is affected. The parties have agreed to resolve this case by Settlements to avoid the time, expense, and uncertainty associated with resolving this case by a jury trial.

WHO IS IN THE SETTLEMENTS?

To see if you are entitled to benefits from these Settlements, you first have to determine if you are a Class Member.

4. How do I know if I am part of the Settlements?

You are included in one or more of the Settlements (as a Class Member) if you:

- Directly purchased Freight Forwarding Services;
- From any of the Defendants, their subsidiaries, or affiliates;
- In the United States OR outside the United States but for shipments within, to, or from the United States; and
- From January 1, 2001 through September 14, 2012.

Businesses or individuals may be Class Members.

You are **not** a member of the Class, even if you meet the above criteria, if you are a government entity, Defendant, or one of the Defendants' parent companies, subsidiaries, and affiliates.

5. What are Freight Forwarding Services?

"Freight Forwarding Services" is defined as freight forwarding, transportation, or logistics services for shipments, and includes services relating to the organization or transportation of items via air, ocean, rail, and road, both nationally and internationally, and related activities such as customs clearance, warehousing, and ground services.

Questions? Call U.S. & CANADA (TOLL-FREE): 1-877-276-7340 INTERNATIONAL (TOLL) 1-503-520-4400
or Visit www.FreightForwardCase.com

6. I'm still not sure if I'm a Class Member.

If you are still not sure whether you are a member of the Class, you can call 1-877-276-7340 or visit www.FreightForwardCase.com.

THE SETTLEMENTS' BENEFITS**7. What do the Settlements provide?**

The Settling Defendants have agreed to pay a minimum of ~~\$102,111,864.54~~ \$105,611,864.54 for the benefit of the Class. This money will be put into a Settlement Fund that will be distributed to Class Members. The Settling Defendants' specific contributions to the Settlement Fund are as follows:

SETTLING DEFENDANT(S)	AMOUNT CONTRIBUTING
Schenker	\$8,750,000
EGL	\$10,000,000 plus up to \$10,000,000 in proceeds from its cash benefits from the <i>Air Cargo</i> case
Expeditors	70% of all its cash benefits from the <i>Air Cargo</i> case
Nishi-Nippon	\$20,082,896 plus up to \$500,000 from the <i>Air Cargo</i> case
Vantec	\$9,900,000 plus all its cash benefits from the <i>Air Cargo</i> case with a guaranteed minimum of \$300,000
United Aircargo Consolidators, Inc.	\$295,275 and 75% (subject to adjustment as specified in the Settlement Agreement) of all cash benefits from the <i>Air Cargo</i> case
Kuehne & Nagel	\$28,000,000 plus 99.7% of all cash benefits from the <i>Air Cargo</i> case
Morrison Express	\$1,678,700 and 72.5% of all cash benefits received from the <i>Air Cargo</i> case after October 5, 2012
UTi Worldwide, Inc.	\$3,243,658 and 80.5% of all cash benefits received from the <i>Air Cargo</i> case after December 5, 2012
<u>ABX Logistics</u> <u>Worldwide NV/SA</u>	<u>\$3,500,000</u>

The *Air Cargo* case is a separate class action in which many of the Defendants in this lawsuit sued airlines and other air cargo service providers, making price-fixing claims. A number of the defendants in the *Air Cargo* case have agreed to Settlements with Defendants in this lawsuit.

Questions? Call U.S. & CANADA (TOLL-FREE): 1-877-276-7340 INTERNATIONAL (TOLL) 1-503-520-4400
or Visit www.FreightForwardCase.com

As part of each of the Settlements, some of the Settling Defendants¹ will also provide Class Counsel with cooperation in the continuing lawsuit against the Non-Settling Defendants.

Plaintiffs will post on or before ~~January 25~~ March 4, 2013 on www.FreightForwardCase.com the proposed plan of allocation of the proceeds of the Settlements. Please refer to the website for the contents of the plan. As with all other aspects of notice, you may object to any aspect of the plan on or before ~~March 29~~ June 28, 2013 by following the procedures described in this Notice.

8. How do I submit a claim for benefits from the Settlements?

If you received a Mailed Notice from the Settlement Administrator directing you to this Notice, the Claim Form was sent to you with that Mailed Notice and you will receive future notifications containing additional important information, including with respect to any future Settlements. You will find instructions on how to submit a claim online at www.FreightForwardCase.com. You do not need to take any action at this time to remain in the Class but you will have to submit a claim form by November 22, 2013 in order to be eligible to receive payment. (But *see* Question 21 below).

If you did not receive a Mailed Notice from the Settlement Administrator, you can submit a Claim Form at www.FreightForwardCase.com. If you submit a Claim Form, you will receive future notifications containing additional important information, including with respect to any future Settlements. You may also download and mail your completed form to:

Freight Forwarders Claims Administrator
P.O. Box 3747
Portland, Oregon 97208-3747

You may also call the Claims Administrator at 1-877-276-7340 (in the U.S. or Canada) to obtain a Claim Form, or write the Claims Administrator at the address above. Class Members outside of the U.S. or Canada may reach the Claims Administrator at (503) 520-4400.

Please keep all documentation you have about purchasing Freight Forwarding Services during the relevant dates for your use in filing a claim later.

9. What am I giving up to remain in the Class?

If the Settlements become final, you will give up your right to sue the Settling Defendants about the claims resolved by the Settlements. The specific claims you are giving up against the Settling Defendants are described in the Settlement Agreements (see chart below). Unless you exclude yourself (*see* Question 10) you are “releasing” the claims (*i.e.*, giving up your right to sue), whether you submit a claim or not.

¹ Expeditors has not agreed to provide Class Counsel with cooperation in the continuing lawsuit against the Non-Settling Defendants.

The Settlement Agreements are available at www.FreightForwardCase.com. The specific claims you are releasing are described in the Settlement Agreement with each Settling Defendant, as follows:

SETTLING DEFENDANT	SETTLEMENT AGREEMENT SECTION
Schenker	Section II (A)
EGL	Section II (B)
Expeditors	Section II (A)
Nishi-Nippon	Section II (B)
Vantec	Section II (B)
United Aircargo Consolidators	Section II (C)
Kuehne & Nagel	Section II (B)
Morrison Express	Section II (B)
UTi Worldwide	Section II (B)

<u>ABX Logistics Worldwide</u> <u>NV/SA</u>	<u>Section II (B)</u>
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EXCLUDING YOURSELF FROM THE SETTLEMENTS

If you don't want benefits from one or more of the Settlements, and you want to keep the right to sue or continue to sue the Settling Defendants on your own about the legal issues in this case, then you must take steps to get out of the Settlement(s). This is called excluding yourself or "opting out" of the Class.

10. How do I exclude myself from a Class?

To exclude yourself from a Settlement, you must send a letter to Class Counsel that includes the following:

- Your name, address, and telephone number;
- All trade names or business names and addresses you or your business have used, as well as any parents, subsidiaries or affiliates who are also requesting to be excluded from the Class that purchased Freight Forwarding Services at any time from January 1, 2001 through ~~February 28, 2012 for the Expeditors Settlement; from January 1, 2001 through May 9, 2012 for the Nishi Nippon Settlement; from January 1, 2001 through August 9, 2012 for the United Aircargo Consolidators, Inc. Settlement; from January 1, 2001 through September 14, 2012 for the Kuehne & Nagel Settlement and the Morrison Express Settlement; from January 1, 2001 through January 4, 2011 for the UTi Worldwide Settlement; or from January 1, 2001 through September 20, 2011 for the Schenker, EGL, and Vantec Settlements;~~ September 14, 2012;

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- The case name (*Precision Associates, Inc. v. Panalpina World Transport*, No. 08-cv-00042 (JG));
- The Settling Defendant's name in the Settlement for each of the Settlements you are requesting to be excluded from. You must separately identify each Settlement for which exclusion is sought.
 - **Note: If you request exclusion from the Schenker Settlement, you automatically are requesting exclusion from all of the Settlements and from any further settlements or recoveries in this action.** (See Question 12.)
- A signed statement that "I/we hereby request that I/we be excluded from the Class(es) listed in this letter in *Precision Associates, Inc. v. Panalpina World Transport*, No. 08-cv-00042 (JG)";
- A list of all Defendants from whom you purchased Freight Forwarding Services and an estimated total amount you paid for Freight Forwarding Services during the Class Period for each Settlement you are requesting to be excluded from.

You must mail your exclusion request, postmarked no later than ~~March 29~~, June 28, 2013, to one of the following attorneys:

Christopher Lovell Lovell Stewart Halebian Jacobson LLP 61 Broadway, Suite 501 New York, NY 10006 Telephone: (212) 608-1900 Fax: (212) 719-4677	W. Joseph Bruckner Lockridge Grindal Nauen P.L.L.P. 100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401 Telephone: (612) 339-6900 Fax: (612) 339-0981
Steven N. Williams Cotchett, Pitre & McCarthy, LLP San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010 Telephone: (650) 697-6000 Fax: (650) 697-0577	Daniel E. Gustafson Gustafson Gluek PLLC Canadian Pacific Plaza 120 South 6 th Street, Suite 2600 Minneapolis, MN 55402 Telephone: (612) 333-8844 Fax: (612) 339-6622

11. If I don't exclude myself, can I sue the Defendants for the same thing later?

For each Settlement, unless you exclude yourself, you give up the right to sue that Settling Defendant about the issues in this lawsuit. You give up these rights even if you don't submit a Claim Form and receive the benefits of the Settlement. You must exclude yourself from the Class in order to sue a Settling Defendant separately. (But see Question 13.)

These Settlements have no effect on your ability to sue the Non-Settling Defendants separately.

12. If I exclude myself from a Settlement, can I still get benefits from that Settlement?

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No. You will not get any benefits from a Settlement if you exclude yourself from that Settlement. However, you can exclude yourself from a Settlement with one Settling Defendant but remain in others and file Claim Forms for benefits in those Settlements.

The only exception is the Schenker Settlement. If you exclude yourself from that Settlement, you automatically exclude yourself from this lawsuit for all purposes, including from all of the Settlements with the Settling Defendants and any future settlements with Non-Settling Defendants.

13. If I exclude myself from a Settlement, can I change my mind later?

Yes. If you have properly submitted an exclusion request, you have the right to apply to the Court to re-enter a Settlement Class. However, if you apply to re-enter a Settlement Class after an interim distribution of Settlement proceeds has been made to Class Members, you will receive less than if you remain in the Settlement Class. Please visit the website or call **1-877-276-7340** for details about how to apply to the Court to re-enter the Settlement Class.

THE LAWYERS REPRESENTING YOU

14. Do I have a lawyer in this case?

The Court has appointed the firms and lawyers listed below as Class Counsel in this case:

Christopher Lovell Lovell Stewart Halebian Jacobson LLP 61 Broadway, Suite 501 New York, NY 10006 Telephone: (212) 608-1900 Fax: (212) 719-4677	W. Joseph Bruckner Lockridge Grindal Nauen P.L.L.P. 100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401 Telephone: (612) 339-6900 Fax: (612) 339-0981
Steven N. Williams Cotchett, Pitre & McCarthy, LLP San Francisco Airport Office Center 840 Malcolm Road, Suite 200 Burlingame, CA 94010 Telephone: (650) 697-6000 Fax: (650) 697-0577	Daniel E. Gustafson Gustafson Gluek PLLC Canadian Pacific Plaza 120 South 6 th Street, Suite 2600 Minneapolis, MN 55402 Telephone: (612) 333-8844 Fax: (612) 339-6622

Class Counsel will represent you and other members of the Class. You will not be charged for these lawyers. If you want to be represented by your own lawyer, you may hire one at your own expense.

15. How will the lawyers be paid?

The Court will decide how much Class Counsel will be paid. Class Counsel has not submitted a request for attorneys' fees or litigation expenses at this time; however, when Class Counsel seeks

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fees, they will ask for no more than 33% of the Settlement Fund, plus interest, and reimbursement for their expenses.

OBJECTING TO THE SETTLEMENTS

16. How do I tell the Court that I don't like the Settlement(s)?

If you are a member of the Class, you can object to all or part of one or more Settlements, Class Counsel's requests for fees and expenses, or both. To object, you must submit a letter that includes the following:

- Your name, address, and telephone number;
- A statement saying that you object to the Settlement(s) in *Precision Associates, Inc. v. Panalpina World Transport*, No. 08-cv-00042 (JG);
- The Settling Defendant's name in the Settlement or each of the Settlements you are objecting to;
- Proof of your membership in the Class;
- The reasons you object to the Settlement(s), along with any supporting materials; and
- Your signature.

You must submit your objection to the court, no later than ~~March 29~~, June 28, 2013 by delivering it by hand or sending it by mail to the following address:

Clerk of the Court
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

17. What's the difference between objecting and excluding?

Objecting is simply telling the Court that you don't like something about the Settlement(s). You can object to a Settlement only if you do not exclude yourself from that Settlement. Excluding yourself from a Settlement is telling the Court that you don't want to be part of the Settlement. If you exclude yourself from a Settlement, you have no basis to object to the Settlement because it no longer affects you.

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THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlements and any requests for fees and expenses. You may attend, but you don't have to do so. If you have filed an objection, you may appear and tell the Court about your concerns.

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18. When and where will the Court decide whether to approve the Settlements?

The Court will hold a Fairness Hearing at 10:00 a.m. on ~~May 13~~, August 12, 2013, at the U.S. District Court for Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201. The hearing may be moved to a different date or time without additional notice, so it is a good idea to check www.FreightForwardCase.com.

At this hearing the Court will consider whether the Settlement is fair, reasonable, and adequate. The Court will also consider any request by Class Counsel for attorneys' fees and expenses. If there are objections, the Court will consider them at this time. After the hearing, the Court will decide whether to approve the Settlement. The Court's decision may be appealed. We do not know how long these decisions will take. Please be patient.

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19. Do I have to come to the hearing?

No. Class Counsel will answer questions the Court may have. But, you may come at your own expense. If you send an objection, you don't have to come to Court to talk about it. As long as you submitted your written objection on time, to the proper addresses, the Court will consider it. (See Question 20 about your right to speak.) You may also pay your own lawyer to attend, but it's not necessary.

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20. May I speak at the hearing?

Yes. You may appear at the hearing, either on your own, or through an attorney you hire, to present any evidence or argument that the Court decides is proper and relevant.

IF YOU DO NOTHING**21. What happens if I do nothing at all?**

If you received a Mailed Notice directing you to this Notice, you do not have to do anything right now if you wish to remain a class member. You are automatically registered to receive future notifications about the case. If you wish to claim benefits, you must fill out and submit the Claim Form at www.FreightForwardCase.com or by mail no later than **November 22, 2013** according to the directions on the Claim Form. You will receive future notifications, when available.

If you did not receive a Mailed Notice from the Settlement Administrator, you can either submit a Claim Form online at www.FreightForwardCase.com, or contact the Settlement Administrator to receive a Claim Form and any future notifications. If you do nothing, you will not receive benefits from the Settlement.

Unless you exclude yourself, you won't be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against the Settling Defendants about the legal issues in this case, ever again.

ADDITIONAL INFORMATION

Questions? Call U.S. & CANADA (TOLL-FREE): 1-877-276-7340 INTERNATIONAL (TOLL) 1-503-520-4400
or Visit www.FreightForwardCase.com

22. How do I get more information?

This notice summarizes the proposed Settlements. More details are in the Settlement Agreements. You can get a copy of the Settlement Agreements at www.FreightForwardCase.com. You may also write with questions to Freight Forwarders Claims Administrator, P.O. Box 3747, Portland, Oregon 97208-3747 or call 1-877-276-7340. If you did not receive a Mailed Notice from the Settlement Administrator directing you to this Notice, you can submit a Claim Form online at www.FreightForwardCase.com, or contact the Settlement Administrator to receive a Claim Form and future information.

ATTACHMENT 1**LIST OF DEFENDANTS**

- Panalpina World Transport (Holding) Ltd.;
- Panalpina, Inc.;
- Kühne + Nagel International AG;
- Kuehne + Nagel, Inc.;
- Expeditors International of Washington, Inc.;
- EGL, Inc.;
- EGL Eagle Global Logistics, LP;
- Deutsche Bahn AG;
- Schenker AG;
- Schenker, Inc.;
- BAX Global, Inc.;
- DB Schenker;
- Deutsche Post AG;
- Danzas Corporation, d/b/a DHL Global Forwarding;
- DHL Express (USA), Inc.;
- DHL Global Forwarding Japan K.K.;
- DHL Japan, Inc.;
- Exel Global Logistics, Inc.;
- Air Express International USA, Inc.;
- UTi Worldwide Inc.;
- United Parcel Service, Inc.;

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- UPS Supply Chain Solutions, Inc.;
- ABX Logistics Worldwide NV/SA;
- DSV A/S;
- DSV Solutions Holding A/S;
- DSV Air & Sea Ltd.;
- SDV Logistique Internationale;
- Dachser Intelligent Logistics;
- Dachser Transport of America, Inc.;
- Geo-Logistics Corporation;
- Agility Logistics Corporation;
- Geologistics International Management (Bermuda) Ltd.;
- Baltrans Logistics, Inc.;
- Toll Global Forwarding (USA), Inc.;
- Hellmann Worldwide Logistics, Inc.;
- Geodis S.A.;
- Geodis Wilson USA, Inc.;
- Jet Speed Logistics, Ltd.;
- Jet Speed Air Cargo Forwarders (USA), Inc.;
- Jet Speed Logistics (USA), LLC;
- Morrison Express Logistics PTE Ltd.;
- Morrison Express Corporation (USA);
- Nippon Express Co., Ltd.;
- Nippon Express USA, Inc.;
- Yusen Air & Sea Service Co., Ltd.;
- Yusen Air & Sea Service (U.S.A.), Inc.;
- Kintetsu World Express, Inc.;
- Kintetsu World Express (U.S.A.), Inc.;
- Nishi-Nippon Railroad Co., Ltd.;
- Hankyu Hanshin Express Holdings Corporation;
- Hankyu Hanshin Express Co. Ltd.;
- Hanshin Air Cargo Co., Ltd.;
- Hanshin Air Cargo USA, Inc.;
- Nissin Corporation;
- Nissin International Transport U.S.A., Inc.;
- Vantec Corporation;
- Vantec World Transport (USA), Inc.;
- "K" Line Logistics, Ltd.;
- "K" Line Logistics (U.S.A.), Inc.;
- Yamato Global Logistics Japan Co.;
- Yamato Transport U.S.A., Inc.;
- MOL Logistics (Japan) Co., Ltd.;
- MOL Logistics (U.S.A.), Inc.;
- United Aircargo Consolidators, Inc.;
- Spedlogswiss, aka The Association Of Swiss Forwarders;

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- Shanghai International Freight Forwarders Association;
- Japan Aircargo Forwarders Association

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